

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: ISAAC'S AUTOMOTIVE, INC.
Debtor

Case No. 16-50695 KMS
Chapter 11 Proceedings

**DEBTOR'S RESPONSE TO MOTION TO ABANDON COLLATERAL AND
LIFT AUTOMATIC STAY (DKT. #35)**

COMES NOW the Debtor, ISAAC'S AUTOMOTIVE, INC., by and through its Counsel of Record, David L. Lord, and files its Response to the Motion to Abandon Collateral and Lift Automatic Stay (DK #35) filed by Hope Enterprise Corporation ("Hope") and would show unto the Court the following, to-wit:

1. Debtor admits the allegations of Paragraph 1.
2. Debtor admits the allegations of Paragraph 2.
3. Debtor admits the allegations of Paragraph 3.
4. Debtor admits the allegations of Paragraph 4.
5. Debtor admits the allegations of Paragraph 5.
6. Debtor admits the allegations of Paragraph 6.
7. Debtor has insufficient information to admit or deny the allegations of Paragraph 7 and would deny them and demand strict proof of the same.
8. Debtor has insufficient information to admit or deny the allegations of Paragraph 8 and would deny them and demand strict proof of the same.
9. Debtor denies the allegations of Paragraph 9.
10. Debtor has insufficient information to admit or deny the allegations of Paragraph 10 and each of its sub-paragraphs and would deny them and demand strict proof of the same.
11. Debtor denies the allegations of Paragraph 11.

12. Debtor denies that Hope's security interest in not adequately protected.

Debtor asserts that the real property is necessary and essential for an effective reorganization through Chapter 11 of the bankruptcy code.

13. Debtor denies the allegations of the unnumbered "WHEREFORE, . . ." paragraph and each of its sub-paragraphs.

WHEREFORE, the Debtor prays that the Court will deny the Motion to Lift Stay and allow his Plan to proceed as proposed, hereafter confirmed or hereafter modified or amended. Debtor prays for general relief.

RESPECTFULLY SUBMITTED this the 18th day of August, 2016.

ISAAC'S AUTOMOTIVE, INC., Debtor, by:

/s/David L. Lord
David L. Lord 1427
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CERTIFICATE OF SERVICE

I, David L. Lord, do hereby certify that I have this day served either by the Notice of Electronic Filing or mailed, postage pre-paid, by First Class U. S. Mail, a true and correct copy of the above and foregoing Response to the following named parties on this the 18th day of August, 2016.

/s/David L. Lord
David L. Lord

Warren Cuntz, Esq.
Chapter 13 Trustee
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U. S. Trustee
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